

EXHIBIT “C”

Hearing Date & Time: December 11, 2013, at 10:00 a.m.
Objection Deadline: December 4, 2013, at 5:00 p.m

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

RESIDENTIAL CAPITAL, LLC, *et al.*,

Case No. 12-12020 (MG)

Debtors.

Jointly Administered

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**DECLARATION OF LEONARD KREINCES IN SUPPORT
OF DEBTOR'S MOTION, PURSUANT TO RULE 9019 OF
THE FEDERAL RULES OF BANKRUPTCY PROCEDURE,
FOR APPROVAL OF STIPULATION RESOLVING DISPUTE**

LEONARD KREINCES, pursuant to 28 U.S.C. § 1746, declares the following to be true
under penalty of perjury:

1. I am an attorney at law, duly admitted to practice in the State of New York and
before this Court.

2. I am a member of Kreinces & Rosenberg, P.C., which is counsel to The Estate of
Marc M. Wolf (the "**Wolf Estate**").

3. I submit this declaration in support of the *Debtor's Motion, Pursuant To Rule
9019 Of The Federal Rules Of Bankruptcy Procedure, For Approval Of Stipulation Resolving
Dispute*, made pursuant to Federal Rule of Bankruptcy Procedure 9019 (the "**Motion**").

4. The facts set forth herein are based on my investigation into the recoverable assets of the Wolf Estate, a review of documents related to the Debtors' and the Lawyers' Fund for Client Protection for the State of New York's (the "**Lawyers' Fund**") claims against the Wolf Estate and Saxon Equity Mortgage Bankers, Ltd., and based on my communications with the Debtors' and the Lawyers' Fund.

FACTS

5. On December 13, 2007, Wolf committed suicide. At the time of his death, Wolf was a resident of Nassau County New York. Wolf left a Last Will and Testament, which was admitted to probate (Index. Number 349749) (the "**Probate Case**") by the Surrogates Court of the State of New York, County of Nassau (the "**Surrogates Court**").

6. The Surrogates Court appointed Virginia Wolf as the executrix of the Estate of Mark Wolf (the "**Wolf Estate**").

7. On or about February 11, 2008, the Lawyers Fund filed a claim in the Probate Case, in the amount of \$60,000. The Lawyer's Fund claim was filed in connection with a loss in connection with legal services provided by Marc Wolf's firm, Wolf & Wolf Esqs.

8. On or about July 28, 2008, RFC filed a claim in the Probate Case, in the amount of \$6,267,686, in connection with certain loans made, pursuant to the *Eighth Amended and Restated Warehousing Credit and Security Agreement*, including interest and fees.

9. Since Wolf's death and the creation of the Wolf Estate, I have conducted an extended investigation into the assets of the Wolf Estate. This investigation included subpoenaing various banks to locate the assets of Wolf and hiring a certified public accounting firm to review the bank statements and other financial documents. I was unable to review the books and records of Saxon because these documents are missing. I have determined that other

than approximately \$92,241.25 in net assets, after the payment of administrative fees and income taxes, no other assets are recoverable.

Dated: Garden City, New York
October 28, 2013

/s/ Leonard Kreinces
Leonard Kreinces, Esq.

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